

REMARKS

The Office Action dated June 12, 2006, has been received and carefully considered. In this response, claims 1, 64, 79, 101, and 105 have been amended. Entry of the amendments to claims 1, 64, 79, 101, and 105 is respectfully requested. Reconsideration of the outstanding rejections in the present application is also respectfully requested based on the following remarks.

At the outset, the undersigned thanks the Examiner for the courtesies extended during the interview conducted on August 14, 2006, during which agreement was reached on a limitation to be added to the independent claims to facilitate allowance of the present application, which is reflected herein.

I. THE ANTICIPATION REJECTION OF CLAIMS 1-23, 28, 30-44, 46, 47, 52, 62-68, 76-84, 86, 92, 93, 98, 100-103, 105, AND 106

On pages 2-12 of the Office Action, claims 1-23, 28, 30-44, 46, 47, 52, 62-68, 76-84, 86, 92, 93, 98, 100-103, 105, and 106 were rejected under 35 U.S.C. § 102(e) as being anticipated by Roohparvar (U.S. Patent Application Publication No. US2005/0259506). This rejection is hereby respectfully traversed with amendment.

Regarding claim 1, the Examiner asserts that Roohparvar teaches a method for scheduling a device command comprising:

issuing a first device command (i.e., a READ command); and issuing a first value (i.e., m clocks) associated with the first device command, wherein the first value determines, at least in part, a first performance time at which the first device command is to be performed (see paragraph [0077] and Figure 3).

Applicants respectfully disagree. However, in order to expedite allowance of the present application, and in view of the agreement reached during the Examiner Interview held on August 14, 2006, Applicants have amended claim 1 to recite an additional limitation regarding the command performance time being separate from a data time at which data associated with the performance of the command is available or required. It is respectfully submitted that Roohparvar does not teach, or even suggest, the presently claimed invention as recited in claim 1. Accordingly, it is respectfully submitted that claim 1 should be allowable over Roohparvar.

Claims 2-23, 28, 30-44, 46, 47, 52, 62, and 63 are dependent upon independent claim 1. Thus, since independent claim 1 should be allowable as discussed above, claims 2-23, 28, 30-44, 46, 47, 52, 62, and 63 should also be allowable at least by virtue of their dependency on independent claim 1. Moreover, these claims recite additional features which are not disclosed,

or even suggested, by the cited references taken either alone or in combination.

Regarding claims 64, 79, 101, and 105, these claims recite subject matter related to claim 1. Also, claims 64, 79, 101, and 105 have been amended in a manner similar to that of claim 1. Thus, the arguments/amendments set forth above with respect to claim 1 are equally applicable to claims 64, 79, 101, and 105. Accordingly, is it respectfully submitted that claims 64, 79, 101, and 105 are allowable over Roohparvar for the same reasons as set forth above with respect to claim 1.

Claims 65-68, 76-78, 80-84, 86, 92, 93, 98, 100, 102, 103, and 106 are dependent upon independent claims 64, 79, 101, and 105. Thus, since independent claims 64, 79, 101, and 105 should be allowable as discussed above, claims 65-68, 76-78, 80-84, 86, 92, 93, 98, 100, 102, 103, and 106 should also be allowable at least by virtue of their dependency on independent claims 64, 79, 101, and 105. Moreover, these claims recite additional features which are not disclosed, or even suggested, by the cited references taken either alone or in combination.

In view of the foregoing, it is respectfully requested that the aforementioned anticipation rejection of claims 1-23, 28, 30-44, 46, 47, 52, 62-68, 76-84, 86, 92, 93, 98, 100-103, 105, and 106 be withdrawn.

II. THE OBVIOUSNESS REJECTION OF CLAIMS 24-27, 29, 48-51, 53,  
59, 60, 69-75, 94-97, AND 99

On pages 12-13 of the Office Action, claims 24-27, 29, 48-51, 53, 59, 60, 69-75, 94-97, and 99 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Roohparvar (U.S. Patent Application Publication No. US2005/0259506). This rejection is hereby respectfully traversed.

Claims 24-27, 29, 48-51, 53, 59, 60, 69-75, 94-97, and 99 are dependent upon independent claims 1, 64, and 79. Thus, since independent claims 1, 64, and 79 should be allowable as discussed above, claims 24-27, 29, 48-51, 53, 59, 60, 69-75, 94-97, and 99 should also be allowable at least by virtue of their dependency on independent claims 1, 64, and 79. Moreover, these claims recite additional features which are not disclosed, or even suggested, by the cited references taken either alone or in combination.

In view of the foregoing, it is respectfully requested that the aforementioned obviousness rejection of claims 24-27, 29, 48-51, 53, 59, 60, 69-75, 94-97, and 99 be withdrawn.

III. THE OBVIOUSNESS REJECTION OF CLAIMS 45, 54-58, 61, 85, 87-91, 104, AND 107

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On pages 14-15 of the Office Action, claims 45, 54-58, 61, 85, 87-91, 104 and 107 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Roohparvar (U.S. Patent Application Publication No. US2005/0259506) in view of Cashion et al. (U.S. Patent No. 6,195,434). This rejection is hereby respectfully traversed.

It is respectfully submitted that the aforementioned obviousness rejection of claims 45, 54-58, 61, 85, 87-91, 104 and 107 has become moot in view of the deficiencies of the primary reference Roohparvar as discussed above with respect to independent claims 1, 79, 101, and 105. That is, claims 45, 54-58, 61, 85, 87-91, 104 and 107 are dependent upon independent claims 1, 79, 101, and 105 and thus inherently incorporate all of the limitations of independent claims 1, 79, 101, and 105. Also, secondary reference Cashion et al. fails to disclose, or even suggest, the deficiencies of the primary reference Roohparvar as discussed above with respect to independent claims 1, 79, 101, and 105. Indeed, the Examiner does not even assert such. Thus, the combination of secondary reference Cashion et al. with the primary reference Roohparvar also fails to disclose, or even suggest, the deficiencies of the primary reference Roohparvar as discussed above with respect to independent claims 1, 79, 101, and 105. Accordingly, claims 45,

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54-58, 61, 85, 87-91, 104 and 107 should be allowable over the combination of secondary reference Cashion et al. with the primary reference Roohparvar at least by virtue of their dependency on independent claims 1, 79, 101, and 105. Moreover, claims 45, 54-58, 61, 85, 87-91, 104 and 107 recite additional features which are not disclosed, or even suggested, by the cited references taken either alone or in combination.

In view of the foregoing, it is respectfully requested that the aforementioned obviousness rejection of claims 45, 54-58, 61, 85, 87-91, 104 and 107 be withdrawn.

IV. CONCLUSION

In view of the foregoing, it is respectfully submitted that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number, in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

To the extent necessary, a petition for an extension of time under 37 CFR § 1.136 is hereby made.

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Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-0206, and please credit any excess fees to the same deposit account.

Respectfully submitted,

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